

being returned non est on October 25, 1974, and the second being returned non est on September 22, 1975.

3. Your Complainants then attempted to serve process on the Respondents by registered mail, return receipt requested, mailed June 14, 1976, which mail was refused by said Respondents and returned unclaimed to your Complainants.

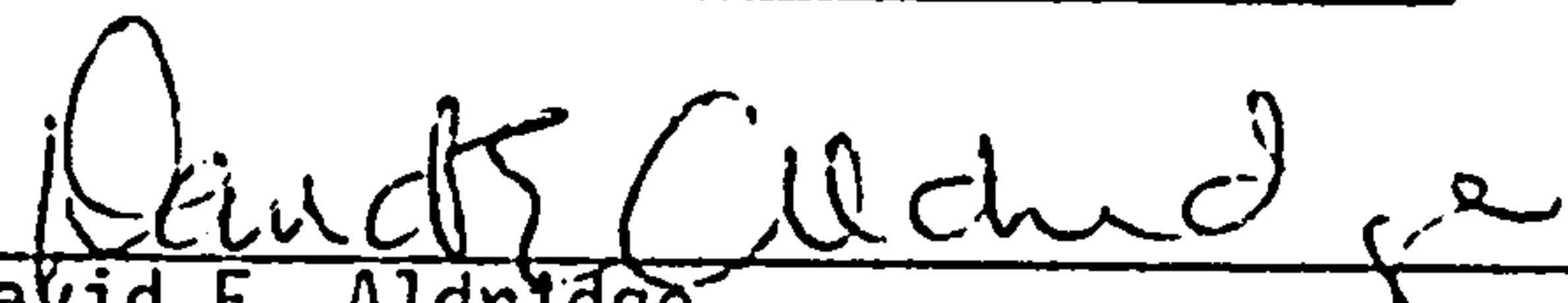
4. Notwithstanding your Complainants' reasonable efforts, made in good faith, to locate the Respondents, they have not been served with process and their whereabouts remain unknown to your Complainants.

5. Your Complainants are filing with this Petition a statement under oath setting forth a circumstantial account of the efforts made to locate the Respondents.


6. Your Complainants are also filing herewith an amended Bill of Complaint so that this action will involve only rights relating to land.


7. Rules 105 and 111 of the Maryland Rules of Procedure allow service of process by publication when the whereabouts of the Respondent are unknown and the Complainant files a statement under oath setting forth a circumstantial account of the efforts made to locate the Respondent which satisfies the Court that reasonable efforts to locate the Respondent have been made in good faith; and in an action which rights relating to land shall be involved, service by publication may be effected by Court Order directing the sheriff to set up a copy of the Order of Publication upon the land in question.

WHEREFORE, your Complainants pray that this Honorable Court order service of process upon the Respondents, Ford Goeller and Nina Goeller, by publication according to Rules 105 and 111 of the Maryland Rules of Procedure.


David E. Aldridge

ZIMMERMAN, ALDRIDGE & DWYER

By: 
David E. Aldridge

By: 
F. Theodore Elliot, III

120 West Church Street
Frederick, Maryland 21701
Telephone: 301-663-5191

Solicitors for Complainants

ZIMMERMAN, ALDRIDGE
& DWYER
ATTORNEYS AT LAW
120 WEST CHURCH STREET
FREDERICK, MARYLAND 21701
(301) 663-5191